

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

SEP 27 2021

Elizabeth Sines, et al

Plaintiffs

v

Jason Kessler, et al

Defendants

Case No: 3:17-cv-072-NKM

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

MOTION FOR LEAVE TO SUPPLEMENT DEFENDANT'S EXHIBIT LIST
AND DISCLOSURE OF THE TRANSCRIPT OF THE AUGUST 11, 2017, LEADERSHIP
MEETING.

Comes Now the Defendant, Christopher Cantwell, and, he Moves this Court for Leave to Supplement his Exhibit List with the attached transcript of the August 11, 2017, "Leadership Meeting" and, also Discloses this Transcript to all parties pursuant to Fed.R.Civ.P. 26. In support, Cantwell states as follows:


- 1) The Second Amended Complaint in this matter alleges that, on August 11, 2017, Cantwell entered into the charged conspiracies by reaching an agreement with Defendants Ray and Kline to commit acts of violence at a meeting at MacIntire Park.
- 2) Cantwell has indicated in several of his previous filings that he intends to introduce at trial a video of that meeting which he made using a body camera, and, that this video will show that he reached no such agreement with Ray, Kline, or, any other person.
- 3) In August of 2021, Cantwell for the first time gained access from USP-Marion to the video of the August 11, 2017 "leadership meeting." Today, September 24, 2021, Cantwell

has produced the attached transcript of the relevant portion of the body camera video. He avers that this transcript is true and correct, and now discloses this transcript to all other parties pursuant to Fed.R.Civ.P. 26.

- 4) The transcript is an admissible summary document pursuant to Fed.R. Evid. 1006. The Plaintiffs and all other parties have a copy of the original video recording, and, Cantwell anticipates testifying from personal knowledge at the trial as to the truth and correctness of the underlying video.

Thus, Cantwell moves this Court for leave to supplement his exhibit list with this transcript, which he anticipates will be used to examine and cross-examine witnesses and which he will move into evidence with the video of the August 11, 2017, meeting.

Respectfully Submitted,



Christopher Cantwell
USP-Marion
PO Box 1000
Marion, IL 62959

CERTIFICATE OF SERVICE

I hereby certify that this Motion for Leave to Supplement was mailed to the Clerk of the Court, 1st Class Postage prepaid, for posting upon the ECF system to which all other parties are subscribed, and, handed to USP-Marion staff members Nathan Simpkins and/or Kathy Hill for electronic transmission to the Court this 27th day of September, 2021.



Christopher Cantwell